



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

December 1, 2022

VIA ECF

The Honorable Paul G. Gardephe
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: United States v. James Zhong
22 Cr. 606 (PGG)

Dear Judge Gardephe:

The Government respectfully moves, with the consent of the Defendant, pursuant to Rule 36 of the Federal Rules of Criminal Procedure, that the Court enter the proposed Corrected Preliminary Order of Forfeiture as to Specific Property and Substitute Assets/Money Judgment attached hereto, to correct a clerical error. Specifically, as set forth in the supporting Declaration also attached hereto, the original Preliminary Order of Forfeiture as to Specific Property and Substitute Assets/Money Judgment, which was agreed to and proposed by the parties, and entered by this Court on November 4, 2022, incorrectly listed the United States Marshals Service as the agency to handle payments on the Money Judgment imposed on the Defendant. The Government has subsequently learned that the correct agency is the United States Department of Treasury.

Accordingly, the Government respectfully requests that the Court enter the attached Corrected Preliminary Order of Forfeiture as to Specific Property and Substitute Assets/Money Judgment correcting the error.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: /s/ David R. Felton
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